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**From:** Buffo, Corey [Buffo.Corey@epa.gov]  
**Sent:** 9/5/2019 1:43:43 PM  
**To:** Bouma, Stacey [Bouma.Stacey@epa.gov]  
**CC:** Able, Tony [Able.Tony@epa.gov]  
**Subject:** RE: Corey...R4 priorities this week...

Yes. The first one, GA rec, we will cover Friday afternoon at a regular check in with Deborah. And we are rescheduling the Friday morning for GA narrative to brief Sara with you all and OGC.

As to the latter, after reading through your paper, I think we are in agreement that waiting for the outcome court case is not very compelling unless you start from the position that the change is non-substantive. We can probably move through that pretty quickly. I am not as solid on the other argument in there about definitions and surplusage cannon. First, unreasonably is not an adjective but it is an adverb, and any follow up definition if you point to one should probably point to the adverb's definition, which is something like "in a way that is unfair or unacceptable". That seems to tell a different story. And citing a cannon of statutory interpretation often invites citations to alternative cannons, while it is hard to persuade policy people here with such a formalistic argument. But, of course, you all are welcome to make it.

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**From:** Bouma, Stacey  
**Sent:** Thursday, September 05, 2019 8:52 AM  
**To:** Buffo, Corey <Buffo.Corey@epa.gov>  
**Cc:** Able, Tony <Able.Tony@epa.gov>  
**Subject:** Corey...R4 priorities this week...

Hi Corey,

I wanted to make sure we're on the same page. Our priorities for this week are:

1. RSTSSB brief/talk with Deborah Nagle (Thursday or Friday) on GA rec (bacteria) to see if she agrees with R4 recommendation to disapprove
2. R4 (Tony and staff) brief/talk with Sara Hisel-McCoy on Friday to explain R4 position/recommendation on GA narrative

I wanted to ensure that GA narrative discussion doesn't circumvent a discussion with DN on GA rec. I can't move forward with an RA brief on GA rec until DN's position is known.

For GA narrative, our attorney is available on Friday from 9-9:45 and also between 11:30-1:30 if you need to meet with DN on GA rec in the morning. If these don't work and we need to find another time on her calendar let us know. Our attorney should be able to brief the info in a 30 minute window.

Just let us know what works. Had two items in your briefing sheet I need to ground truth this morning and will get back with you.

Thanks,  
Stacey

Stacey L. Bouma, Chief  
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